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DEPT. OF TRANSPORTATION
DOT/ETS

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DOCKET NUMBER: FMCSA-2002-12334-47

1. Please indicate your primary occupation(s) from the following list:

- | | |
|--|---|
| <input type="checkbox"/> Truck Driver | <input checked="" type="checkbox"/> Owner-Operator |
| <input type="checkbox"/> Motor Coach / Bus Driver | <input type="checkbox"/> Fleet Manager / Owner |
| <input type="checkbox"/> Company Safety Director | <input type="checkbox"/> Transit System Administrator |
| <input type="checkbox"/> Commercial Driver Trainer | <input type="checkbox"/> Motor Carrier Insurance Provider |
| <input type="checkbox"/> Risk Assessment Specialist | <input type="checkbox"/> Labor Union Representative |
| <input type="checkbox"/> Motor Vehicle Admin.(State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group | <input type="checkbox"/> Other |

2. Do you think a graduated commercial driver's license (GCDL) is needed?

- ☒ Yes ☐ No

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

- ☒ Yes ☐ No

4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

Yes

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

+or - 3 months

6. Should an applicant's past driving record be considered in issuing a GCDL?



Yes



No

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?



Passenger car or light truck motor vehicle accidents



Other convictions for motor vehicle traffic control violations



DUI/DWI convictions



Controlled substances convictions



Reckless driving convictions



Traffic violations and citations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?

No

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

1 year

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- | | |
|---|---|
| <input type="checkbox"/> Reduced hours of service | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.) |
| <input type="checkbox"/> Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving) | <input type="checkbox"/> Limitations on geography or terrain features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, interstate highways, etc.) | |

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

☐ Yes ☒ No

12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL?

18 years

13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

19 years

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Single test to "graduate" to an unrestricted CDL | <input type="checkbox"/> Periodically while holding a GCDL until training is complete |
| <input type="checkbox"/> Initial test plus re-test at 1 year after receiving initial GCDL | <input type="checkbox"/> Other |
-

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

We propose that the initial step in the process to get a CDL be available for drivers making local delivery in vehicles smaller than the large over the road rigs, but larger than 26,000 lbs. We are beverage distributors, and we suffer when our training programs produce CDL drivers, then our employees are cherry picked by over the road companies. We foresee GCDL as a special class for our drivers to achieve and remain at for our drivers

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

See above. For those reasons our costs would decrease especially our CDL training.